

JUDGE ENGELMAYER

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GUYCHRISTIAN AGBOR

18 CV 8611

Write the full name of each plaintiff.

CV  
(Include case number if one has been assigned)

-against-

PRESIDENCY OF THE REPUBLIC OF EQUATORIAL  
GUINEA,  
TEODORO OBIANG NGUEMA MBASOGO,  
DOUGAN CHAMPION ARMANDO

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ Federal Question
- ☒ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, GUYCHRISTIAN AGBOR, is a citizen of the State of  
(Plaintiff's name)

NEW YORK

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

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If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_ REPUBLIC EQUATORIAL GUINEA

and has its principal place of business in \_\_\_\_\_ MALABO, REPUBLIC EQUATORIAL GUINEA.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

First Name	Middle Initial	Last Name
GUYCHRISTIAN		AGBOR
231 W 148TH STREET # 5 L		
Street Address		
NEW YORK, NEW YORK	NY	10039
County, City		State
917-399-4688		cagboresq@gmail.com
Telephone Number		Email Address (if available)

If the defendant is an individual:

The defendant, TEODORO OBIANG NGUEMA MBASOC, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of  
REPUBLIC OF EQUATORIAL GUINEA.

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_  
or is incorporated under the laws of (foreign state) REPUBLIC EQUATORIAL GUINEA  
and has its principal place of business in MALABO, REPUBLIC EQUATORIAL GUINEA.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

First Name	Middle Initial	Last Name
GUYCHRISTIAN		AGBOR
231 W 148TH STREET # 5 L		
Street Address		
NEW YORK, NEW YORK	NY	10039
County, City		State
917-399-4688		cagboresq@gmail.com
Telephone Number		Email Address (if available)



If the defendant is an individual:

The defendant, DOUGAN CHAMPION ARMANDO, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of  
REPUBLIC OF EQUATORIAL GUINEA

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_  
or is incorporated under the laws of (foreign state) REPUBLIC EQUATORIAL GUINEA

and has its principal place of business in MALABO, REPUBLIC EQUATORIAL GUINEA

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

GUYCHRISTIAN

AGBOR

First Name	Middle Initial	Last Name
231 W 148TH STREET # 5 L		
Street Address		
NEW YORK, NEW YORK	NY	10039
County, City	State	Zip Code
917-399-4688	cagboresq@gmail.com	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	PRESIDENCY OF THE REPUBLIC OF EQUATORIAL GUINEA
	First Name Last Name
	Current Job Title (or other identifying information) 800 SECOND AVENUE SUITE 305
	Current Work Address (or other address where defendant may be served) NEW YORK, NY NY 10017
	County, City State Zip Code
Defendant 2:	TEODORO OBIANG NGUEMA MBASOGO
	First Name Last Name
	PRESIDENT OF THE REPUBLIC
	Current Job Title (or other identifying information) 800 SECOND AVENUE SUITE 305
	Current Work Address (or other address where defendant may be served) NEW YORK, NY NY 10017
	County, City State Zip Code
Defendant 3:	ARMANDO DOUGAN CHAMPION
	First Name Last Name
	PRESIDENTIAL ADVISOR
	Current Job Title (or other identifying information) 800 SECOND AVENUE SUITE 305
	Current Work Address (or other address where defendant may be served) NEW YORK, NEW YORK NY 10017
	County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

**III. STATEMENT OF CLAIM**Place(s) of occurrence: NEW YORK, HOUSTONDate(s) of occurrence: 06/02/2012; 03/24/2013; 05/15/2013; 06/26/2013**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

On or about 06/02/2012 during a business meeting with President Obiang Nguema Mbasogo in Houston TX following other meetings in New York, he has personally asked me to negotiate the venue of Miss Universe to his home country of Equatorial Guinea and that he will personally pay me a fee of \$ 275,000.00 when he receives a letter of intent or conditional offer/acceptance letter from the Miss Universe Organization. On or about 03/24/2013, after several negotiations that I conducted with Miss Universe Organization, the latter accepted to organized Miss Universe 2013 in Malabo, Republic of Equatorial Guinea with two conditions precedent: Full fees paid and infrastructure to host the event.

A non binding letter of intent or conditional offer/acceptance was issued and delivered to President Obiang Nguema Mbasogo (Exhibit A). On or about 05/15/2013, I requested and obtained an invitation for the President's wife Mrs. Constancia Mangué De Obiang (Exhibit B) to attend the Miss Universe pageant in Las Vegas NV on about 06/16/2013, and at the same 05/15/2013 President Obiang requested some clarification about the amount to be paid under the proposal agreement and Miss Universe organization provided that clarification (Exhibit C). Mrs. Constancia Mangué de Obiang came to New York on or about 06/18/2013 and Ms. Mba Obono Mokuy, Minister of Culture & Tourism of Equatorial Guinea (Exhibit B). All my efforts to recover my fees were unsuccessful. On or about 06/01/13 Mr. Dougan Champion Armando, Adviser to President Obiang Nguema at the Presidency asked to purchase cellphones for his office at the Presidency, 10 Galaxy 5 were shipped to him by DHL and on 06/23/13 while in the US with the First Lady Mrs. Constancia, I gave Mr. Dougan 20 additional cellphones (5 galaxy 5 and 10 iPhones 5) and he signed the sale agreements here in NY (Exhibit D). All my efforts to recovers the total price of all these cellphones: \$ 50,000.00 were unsuccessful.



These two contracts were purely commercial activities carried on by Defendants in the United States, in the performance or non-performance of which none of them is entitled to Sovereign Immunity, as provided in 28 U.S.C. § 1605(a)(2). In consequence, I ~~performed my contractual obligations in full and in a manner completely conforming to~~ the requirements of both Contracts. Defendants must be held severally and jointly for ~~both contracts as Mr. Armando Dougan Champion works for President Obiang Nguema Mbasogo and both for the Presidency of the Republic of Equatorial Guinea. All my commercial activities were conducted here in New York, the contract (with NY as choice of Law) was signed here, all the phones were shipped from New York or transferred to the defendants in New York. Defendants benefited from my commercial services~~

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#### **INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Psychological trauma and the depression that I have suffered and that I continued to ~~suffer giving lawsuits against my family by credit companies attempting to recover the money used to purchase these phone are unbearable, I have received mostly over the counter anti depressants event after visiting my doctor. I was admitted at the hospital for hours because of extreme stress.~~

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#### **IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

\$50,000.00 (price of cellphones) + \$125,000.00 (contractual late payment interests)=  
\$ 175, 000.00

\$ 275,000.00 (fees for negotiating Miss Universe) = \$ 450,000.00 Dues + reasonable court fees.

I am also requesting \$1,100,000.00 for consequential damages for all that I have been going through since 2013 giving the defendants and associates' reputations of spending money around the world.

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**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

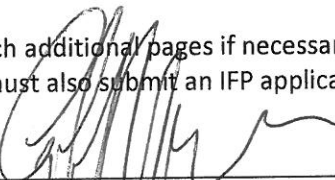
By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

09/19/2018

Dated  
GUYCHRISTIAN

  
Plaintiff's Signature  
AGBOR

First Name  
231 W 148TH STREET

Middle Initial

Last Name

Street Address  
New York, New York

NY

10039

County, City  
917-399-4688

State

Zip Code

cagboresq@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

LIST OF EXHIBITS:

**A** – Letter of Intent or Conditional acceptance from the Miss Universe Organization

**B**-Letter of Invitation to the Mrs. Constanica Mangué de Obiang and Substitution of Delegation

**C**-Letter of Clarification from the Miss Universe Organization.

**D**- Bill of Lading and Contract of sale of goods Signed by Mr. Dougan Champion Armando